

## MA DEP BWP Asbestos Regulations

310 CMR 7.00, 7.09, 7.15

310 CMR 19.061

## General Air Provisions 7.00

- ◆ No person shall “permit emissions which cause or contribute to a condition of air pollution.”
- ◆ Regulations focus on prevention of emissions into ambient air, including asbestos

## Mass & NESHAP

- ◆ MA delegated for NESHAP
- ◆ MA program more stringent than NESHAP
  - Regulate friable and non-friable
  - No thresholds for amount of ACM
  - Regulate individual residences

## Construction & Demolition Notification 7.09(2)

- ◆ Applies to any construction/demolition of any building, except residential buildings with 19 or fewer dwelling units
- ◆ Requires DEP notification 10 working days prior to construction/demolition
- ◆ Use AQ-06 form

## Asbestos Applicability 7.15(1)(a)

- ◆ Prohibits air pollution from “demolition/ renovation, installation, reinstallation, handling, transporting, storage, or disposal of a facility or facility component that contains asbestos, asbestos-containing material, or asbestos-containing waste material”

## Asbestos Notification 7.15(1)(b)

- ◆ Owner/operator must notify DEP 10 working days prior to demolition/ renovation operation involving ACM
- ◆ Emergency waivers available
- ◆ Use ANF-001 form

## Emission Control 7.15 (1)(c)

- ◆ Remove ACM prior to demolition/renovation
- ◆ Adequately wet
- ◆ Carefully lower to ground
- ◆ Seal work area and use air cleaning

## Air Cleaning 7.15(1)(d)

- ◆ Fabric filters
- ◆ HEPA filters
- ◆ Other equivalent air cleaning system

## Waste Disposal 7.15(1)(e)

- ◆ Keep waste wet until seal in leak-tight labeled container
- ◆ Dispose of waste at approved landfill
- ◆ NESHAP has additional provisions:
  - Waste shipment record
  - Transporter and disposal site operator record-keeping

## Special Wastes 310 CMR 19.061

- ◆ Asbestos waste is a listed special waste
- ◆ Receiving MA landfills must have special waste permit to accept asbestos waste
- ◆ Landfill must meet specific handling requirements
  - Waste received must be wetted, containerized, labeled
  - Mark and record areas where asbestos disposed

## Asbestos Cleanups

- ◆ 7.15 applies to cleanups
  - General applicability “catch-all”
  - Notification applies to cleanups involving facility components (i.e., debris) and anything contaminated from demo/reno
- ◆ Generally do not require sealed work area and manual loading at cleanups

## ‘Typical’ Asbestos Cleanup BMPs

- ◆ File ANF-001 (and AQ-06 if applicable)
- ◆ Keep unauthorized personnel out of work area
- ◆ Use wet methods for excavation and loading operations
- ◆ Use water run-off control, filter wastewater prior to disposal

## 'Typical' Asbestos Cleanup BMPs

- ◆ Decontaminate personnel and equipment on daily basis
- ◆ Implement perimeter air monitoring by licensed personnel
- ◆ Erect wind barrier

## 'Typical' Asbestos Cleanup BMPs

- ◆ Immediately load ACM waste into truck or roll-off lined with two 10-mil liners
- ◆ do not compact waste
- ◆ cover and ensure no water leaks
- ◆ Use placarding and waste shipment record

## 'Typical' Asbestos Cleanup BMPs

- ◆ Perform final visual inspection to ensure no asbestos remaining
- ◆ Perform confirmatory soil sampling
- ◆ Maintain proper documentation on site, provide to DEP after cleanup